

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
:
:
IN RE PFIZER INC. SECURITIES LITIGATION : **ORAL ARGUMENT REQUESTED**
:
:
No. 04 Civ. 9866 (LTS) (HBP)
:
-----X

NOTICE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law dated July 2, 2012, the Declaration of George S. Wang, Esq. and the exhibits annexed thereto, the Statement of Material Facts pursuant to Local Civil Rule 56.1, and upon all pleadings and other papers served in this action, Defendants Pfizer Inc., Gail Cawkwell, Joseph Feczko, Karen Katen, John LaMattina, and Henry McKinnell, by their attorneys Simpson Thacher & Bartlett LLP and DLA Piper (US) LLP, will hereby move this Court, at a time and date to be determined, at Courtroom 11C, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Rule 56(a) of the Federal Rules of Civil Procedure granting summary judgment, dismissing Plaintiffs' Complaint in its entirety, and for such other relief as the Court may deem just and proper on the ground that Plaintiffs cannot sustain an action for violation of the federal securities laws.

Defendants certify that they have used their best efforts to resolve informally the matters raised in this motion. Plaintiffs have clearly communicated in a teleconference that they oppose the relief sought.

Dated: New York, New York
July 2, 2012

DLA PIPER LLP (US)
John R. Wellschlager (admitted *pro hac vice*)
6225 Smith Avenue
Baltimore, MD 21209-3600
Telephone: (410) 580-3000
Facsimile: (410) 580-6100

Michael D. Hynes
Rachel V. Stevens
1251 Avenue of the Americas
New York, NY 10020-1104
Telephone: (212) 335-4500
Facsimile: (212) 335-4501

SIMPSON THACHER & BARTLETT LLP

By: /s/ Lynn K. Neuner
Lynn K. Neuner
George S. Wang
Lisa H. Rubin
425 Lexington Avenue
New York, NY 10017
Telephone: (212) 455-2000
Facsimile: (212) 455-2502

Attorneys for Defendants